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Proposed Co-Counsel to the Official  
Committee of Unsecured Creditors of  
Shapes/Arch Holdings L.L.C., et al.

In re:

SHAPES/ARCH HOLDINGS L.L.C., et al.,

Debtors.

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY  
HON. GLORIA M. BURNS  
CASE NO. 08-14631(GMB)

Chapter 11  
(Jointly Administered)

HEARING DATE: May 5, 2008, at 10:00 a.m.

ORAL ARGUMENT WAIVED UNLESS  
OBJECTIONS TIMELY FILED

**NOTICE OF MOTION OF OFFICIAL COMMITTEE OF UNSECURED CREDITORS'  
FOR AN ORDER CONFIRMING THAT THE COMMITTEE IS NOT REQUIRED TO  
PROVIDE GENERAL ACCESS OR OTHERWISE GENERALLY DISCLOSE (A)  
CONFIDENTIAL INFORMATION OF THE DEBTORS OR (B) INFORMATION  
SUBJECT TO ANY PRIVILEGE**

TO: All Parties–in–Interest on the Attached Service List  
- AND -  
All Receiving Electronic Notification From the CM/ECF System

PLEASE TAKE NOTICE that on May 5, 2008, at 10:00 a.m., or as soon thereafter as counsel may be heard, the undersigned, proposed co-counsel for the Official Committee of Unsecured Creditors of Shapes/Arch Holdings L.L.C., et al., (the “Committee”), shall move before the Honorable Gloria M. Burns, United States Bankruptcy Judge, at the United States Bankruptcy Court, 401 Market Street, Second Floor, Camden, New Jersey 08101, for entry of an Order confirming that the Committee is not required to provide general access or otherwise generally disclose (a) confidential information of the Debtors or (b) information subject to any privilege (the “Motion”).

PLEASE TAKE FURTHER NOTICE that in support of the Motion, the undersigned shall rely on the accompanying Application, which sets forth the relevant factual and legal bases upon which the requested relief should be granted. A proposed Order granting the requested relief also is submitted herewith.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Motion shall: (i) be in writing, (ii) state with particularity the basis of the objection; and (iii) be filed with the Clerk of the United States Bankruptcy Court electronically by attorneys who regularly practice before the Bankruptcy Court in accordance with the General Order Regarding Electronic Means for Filing, Signing, and Verification of Documents dated March 27, 2002 (the “General Order”) and the Commentary Supplementing Administrative Procedures dated as of March 2004 (the “Supplemental Commentary”) (the General Order, the Supplemental Commentary and the User’s Manual for the Electronic Case Filing System can be found at [www.njb.uscourts.gov](http://www.njb.uscourts.gov), the official website for the Bankruptcy Court) and, by all other parties-in-interest, on CD-ROM in Portable Document Format (PDF), and shall be served in accordance

with the General Order and the Supplemental Commentary, so as to be received no later than seven (7) days before the hearing date set forth above.

PLEASE TAKE FURTHER NOTICE that unless objections are timely filed, the Motion shall be deemed uncontested in accordance with D.N.J. LBR 9013-1(a), and the relief requested may be granted without a hearing.

PLEASE TAKE FURTHER NOTICE that the undersigned waives oral argument unless objections to the Motion are filed timely.

DATED: April 4, 2008

**HALPERIN BATTAGLIA RAICHT, LLP**  
Proposed Counsel to the Official Committee of  
Unsecured Creditors of Shapes/Arch Holdings  
L.L.C., et al.

By: /s/ Alan D. Halperin  
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Walter Benzija, Esq.

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L.L.C., et al.

By: /s/ Michael D. Sirota  
Michael D. Sirota, Esq.  
Ilana Volkov, Esq.  
Warren A. Usatine, Esq.

**IN RE SHAPES/ARCH HOLDINGS L.L.C.  
CASE NO. 08-14631 (GMB)**

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**Via Regular Mail**

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